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Via ECF – March 11, 2016

To: Magistrate Judge Stephen L. Crocker
U.S. District Court for the Western District of Wisconsin
120 N. Henry Street
Madison, WI 53703

In re: *Gary Suoja v. Owens-Illinois, Inc.*, W.D. WI Case No. 99-cv-475-bbc

Dear Judge Crocker:

Upon review of Plaintiff's Post-Trial Brief filed on January 29, 2016 (ECF DOC # 201.), Plaintiff wishes to inform the Court of several corrections. Plaintiff will file a corrected version of the brief if so directed by the Court. The following corrections highlighted in bold font should be applied to the brief:

- Page 17, Footnote 11: "The email serving the notice lists **four** attorneys ..."
- Page 22, Paragraph 1: "... "30 or 40 guys" ~~or~~ including Ozzie"
- Page 23, Paragraph 2: Footnote 23 should be with the preceding sentence.
- Page 35, Paragraph 1: "*Id.*" citation should be "(ECF #154 at 24.)"
- Page 36, Paragraph 4: "The production lines were built at distinct periods when wars were ongoing **to serve** different and distinct production purposes as weapons technology became more modern. "
- Page 54, Paragraph 2: "... asbestos fibers causes the fatal disease **asbestosis** before ..."
- Page 63, Footnote 74: "This timeline is reproduced on page **71** ..."
- Page 83, Paragraph 1: "OI earlier made a request to exclude testimony about "cumulative" exposures **all** causation testimony of Dr. Frank ..."
- Page 90, Paragraph 1: "... publication by the Saranac Laboratory of ~~the~~ some data ..."
- Page 90, Paragraph 1: "... about Kaylo **and** does not mention ..."
- Page 91, Paragraph 1: "The TLV evidence proves ~~that~~ the lack of protection and the lack of a basis for reliance."

- Page 94, Paragraph 2, Subpoint 2: ~~“(not based on adequate data about asbestos exposure TLVs are set at levels which will allow the continued production of products rather than protecting all workers”~~
- Page 98, Paragraph 1: “... levels of exposure from **use** of the manufacturer’s product.”
- Page 112, Paragraph 2, Subpoint 3: “... when working at **Badger** in 1958 with coworker Zimmer.”
- Page 117, Paragraph 1: “... he did **not** violate any instructions ...”
- Page 170, Paragraph 1: “The medical records **show an** ascending scale of severity of the pain ...”
- Page 170, Paragraph 3: ~~“As Ozzie’s health failed in his days,~~ Ozzie was hospitalized as his health failed in final days, ...”
- Page 177, Paragraph 2: “... suggest Delores did **not** care about Ozzie.”

Please inform me of any questions or if Plaintiff should file a corrected version of Plaintiff’s Post-Trial Brief.

Very truly yours,

/s/ Robert G. McCoy
Attorney for Plaintiff

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CC: Defense counsel through the ECF system